

APR. 17. 2018 4:24PM CIRCUIT CLERK

NO. 886 P. 3

IN THE CIRCUIT COURT OF Kanawha COUNTY, WEST VIRGINIACIVIL CASE INFORMATION STATEMENT
(Civil Cases Other than Domestic Relations)

I. CASE STYLE:

Case No. 18-P-134Judge: Kaufman

Plaintiff(s)

Middletown Valley Bank24 West Main Street, P.O. Box 75Middletown, MD 21769

vs.

Defendant(s)

Justice Farms of North Carolina, LLCName: c/o James C. Justice, III302 S. Jefferson StreetStreet AddressRoanoke, VA 24011City, State, Zip CodeDays to
Answer

Type of Service

Certified Mail

II. TYPE OF CASE:

☐ General Civil☐ Mass Litigation [As defined in T.C.R. 26.04(a)]☐ Asbestos☐ FELA Asbestos☐ Other: _____☐ Habeas Corpus/Other Extraordinary Writ☒ Other: Docketing of Foreign Judgment☐ Adoption☐ Administrative Agency Appeal☐ Civil Appeal from Magistrate Court☐ Miscellaneous Civil Petition☐ Mental Hygiene☐ Guardianship☐ Medical MalpracticeIII. JURY DEMAND: ☐ Yes ☒ No CASE WILL BE READY FOR TRIAL BY (Month/Year): 1IV. DO YOU OR ANY
OF YOUR CLIENTS
OR WITNESSES
IN THIS CASE
REQUIRE SPECIAL
ACCOMMODATIONS?☐ Yes ☒ No

IF YES, PLEASE SPECIFY:

☐ Wheelchair accessible hearing room and other facilities☐ Reader or other auxiliary aid for the visually impaired☐ Interpreter or other auxiliary aid for the deaf and hard of hearing☐ Spokesperson or other auxiliary aid for the speech impaired☐ Foreign language interpreter-specify language: _____☐ Other: _____Attorney Name: Joshua D. BradleyFirm: Rosenberg Martin Greenberg, LLPAddress: 25 South Charles Street, 21st Floor, Baltimore, MD 21201Telephone: 410-727-6600

Representing:

☒ Plaintiff☐ Defendant☐ Cross-Defendant☐ Cross-Complainant☐ 3rd-Party Plaintiff☐ 3rd-Party Defendant☐ Proceeding Without an Attorney

Original and _____ copies of complaint enclosed/attached

Dated: 4/17/18

Signature: _____

SCA-C-100: Civil Case Information Statement (Other than Domestic Relations)

Revision Date: 12/2015

PYMT Type KRept # 51051 \$200 ☒ \$135Iss. Sum. + cc ☒ No Sum. IssRet. to Atty. ☒ \$20cm X 2☒ Mailed CM/RM \$5 clk X

Mailed to sos w/ck#

Sent to _____ w/ck# \$15 mdf X2

Plaintiff: Middletown Valley Bank, et al Case Number: _____

vs.:

Defendant: Justice Farms of North Carolina, LLC, et al**CIVIL CASE INFORMATION STATEMENT
DEFENDANT(S) CONTINUATION PAGE**James C. Justice, II

Defendant's Name

1715 Kanawha Boulevard, E.

Street Address

Charlestown, WV 25305

City, State, Zip Code

Days to Answer: _____

Type of Service: Certified Mail

Defendant's Name

Street Address

City, State, Zip Code

Days to Answer: _____

Type of Service: _____

Defendant's Name

Street Address

City, State, Zip Code

Days to Answer: _____

Type of Service: _____

Defendant's Name

Street Address

City, State, Zip Code

Days to Answer: _____

Type of Service: _____

Defendant's Name

Street Address

City, State, Zip Code

Days to Answer: _____

Type of Service: _____

Defendant's Name

Street Address

City, State, Zip Code

Days to Answer: _____

Type of Service: _____

Defendant's Name

Street Address

City, State, Zip Code

Days to Answer: _____

Type of Service: _____

SCA-C-100: Civil Case Information Statement-Defendant(s) Continuation Page

Revision Date: 12/2015

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

MIDDLETOWN VALLEY BANK
24 West Main Street
PO Box 75
Middletown, MD 21769

Plaintiff/Judgment-Creditor,

v.

JUSTICE FARMS OF NORTH CAROLINA,
LLC
c/o James C. Justice, III
302 S. Jefferson Street
Roanoke, VA 24011

and

JAMES C. JUSTICE, II
1716 Kanawha Boulevard, E.
Charlestown, WV 25305

Defendants/Judgment-Debtors

FILED

2018 APR 23 A 10:50

CATHY S. GATSON, CLERK
KANAWHA COUNTY CIRCUIT COURT

Case No.

18-P-134

Kaufman

AFFIDAVIT OF JOSHUA DYLAN BRADLEY

I, Joshua Dylan Bradley, declare under the penalties of perjury that the following statements are true, accurate and complete to the best of my knowledge, information, and belief:

1. I am competent to be a witness and to testify to the matters stated herein.
2. I am the attorney for Middletown Valley Bank (the "Plaintiff").
3. The Plaintiff is a bank chartered in Maryland which has a principal address located at 24 West Main Street, Middletown, Maryland 21769.
4. I make this affidavit pursuant to W. Va. Code Ann. § 55-14-3 in order to

enforce a foreign judgment entered in favor of the Plaintiff and against the defendants Justice Farms of North Carolina, LLC and James C. Justice, II (together, the "Defendants") in the amount of One Million Four Hundred Seventy-Nine Thousand Seven Hundred Ninety-One Dollars and Thirteen Cents (\$1,479,791.13), plus post-judgment interest and costs (the "Judgment").

5. The Judgment was entered on December 7, 2017 by the Circuit Court of Frederick County, Maryland in favor of Plaintiff and against the Defendants in the case captioned *Middletown Valley Bank v. Justice Farms of North Carolina, LLC et. al.* case No. C-10-CV-17-000131.

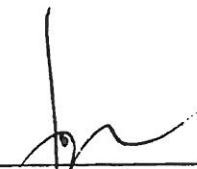
6. An exemplified copy of the Judgment are attached to the Notice of Filing of Foreign Judgment filed in connection herewith.

7. The last known post office address for defendant Justice Farms of North Carolina, LLC is c/o James C. Justice, III, 302 S. Jefferson Street, Roanoke, Virginia 24011.

8. The last known post office addresses for defendant James C. Justice, II is 109 1716 Kanawha Boulevard, E, Charlestown, West Virginia 25305.

9. The Judgment is final, valid, enforceable and unsatisfied.

Date: April 13, 2018



Joshua D. Bradley
Rosenberg Martin Greenberg, LLP
25 South Charles Street, Suite 2115
Baltimore, Maryland 21201
(410) 727-6671

Counsel for Plaintiff, *Middletown Valley Bank*

ACKNOWLEDGMENT

STATE OF MARYLAND, CITY OF BALTIMORE, TO WIT:

I HEREBY CERTIFY that, on this 13th day of April 2018, before me, the undersigned Notary Public of the aforesaid jurisdiction, personally appeared Joshua Dylan Bradley, known to me (or satisfactorily identified), and declared and acknowledged under oath, subject to the penalties of perjury, that the matters and facts set forth herein are true, accurate and complete to the best of his knowledge, information and belief.

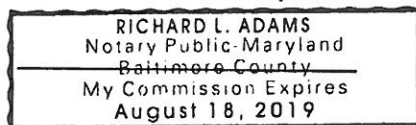
IN WITNESS WHEREOF, I hereunto set my Hand and Notarial Seal.



Notary Public

(SEAL)

My Commission Expires:



4828-6237-6261, v. 1

APR. 17. 2018 4:25PM CIRCUIT CLERK

NO. 886 P. 5

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

FILED

2018 APR 23 A 10:50

CATHY S. GATSON, CLERK
KANAWHA COUNTY CIRCUIT COURT

Middletown Valley Bank

Plaintiff,

v.

Justice Farms of North Carolina, LLC

Defendant.

18-P-134

Kaufman

NOTICE OF FILING OF FOREIGN JUDGMENT

Please take notice that pursuant to West Virginia Code, §55-14-2 et seq., there has been filed in the office of the Clerk of the Circuit Court of Kanawha County, West Virginia, a foreign judgment against you from the State of Maryland, rendered in

Circuit Court of Frederick County in that certain action styled,

" Middletown Valley Bank v. Justice Farms of North Carolina, LLC, et. al. "

an authenticated copy of which is attached hereto and made a part hereof. The Plaintiff is

Middletown Valley Bank, whose attorney is Joshua D. Bradley, Esq.,

Rosenberg Martin Greenberg, LLP, 25 South Charles Street, 21st Floor, Baltimore, MD 21201

You may wish to appear before the Circuit Court to protect your interests.

Date:

4/23/18Cathy S. Gatson, Clerk

Clerk of Circuit Court

C. Atkins

Deputy



CIRCUIT COURT FOR FREDERICK COUNTY,
MARYLAND
100 West Patrick Street
Frederick, Maryland 21701

Clerk of the Court: 301-600-1976
Assignment Office: 301-600-2015

To: JAMES C. JUSTICE, II
1716 KANAWHA BOULEVARD E
CHARLESTON WV 25305

Case Number: C-10-CV-17-000131

MIDDLETOWN VALLEY BANK VS. JUSTICE FARMS OF NORTH CAROLINA, LLC, ET AL.

Date: 12/07/2017

NOTICE OF CONFESSED JUDGMENT

I HEREBY CERTIFY that the following Judgment has been recorded in this Court in the above entitled case.

Judgment Against: James C. Justice, II

Judgment in Favor of: Middletown Valley Bank

Judgment Ordered On: 12/07/2017

Other Fee: \$

Judgment Entry Date: 12/07/2017

Service Fee: \$

Amount of Judgment: \$127,893.17

Attorney Fee: \$

Pre Judgment Interest:

Appearance Fee: \$

Total Judgment: \$127,893.17

Filing Fee: \$

Comments: Together with pre-judgment interest at the rate of \$29.35 per day after November 14, 2017 until the entry of judgment, post-judgment interest, and costs.

You have 30 days after service of this notice upon you to file a written motion to open, modify or vacate the judgment.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of this Court.

Sandra K. Dalton
Clerk of the Circuit Court



**CIRCUIT COURT FOR FREDERICK COUNTY,
MARYLAND**
100 West Patrick Street
Frederick, Maryland 21701

Clerk of the Court: 301-600-1976
Assignment Office: 301-600-2015

To: JAMES C. JUSTICE, II
1716 KANAWHA BOULEVARD E
CHARLESTON WV 25305

Case Number: C-10-CV-17-000131

MIDDLETOWN VALLEY BANK VS. JUSTICE FARMS OF NORTH CAROLINA, LLC, ET AL.

Date: 12/07/2017

NOTICE OF CONFESSED JUDGMENT

I HEREBY CERTIFY that the following Judgment has been recorded in this Court in the above entitled case.

Judgment Against: James C. Justice, II

Judgment in Favor of: Middletown Valley Bank

Judgment Ordered On: 12/07/2017

Other Fee: \$

Judgment Entry Date: 12/07/2017

Service Fee: \$

Amount of Judgment: \$201,265.31

Attorney Fee: \$

Pre Judgment Interest:

Appearance Fee: \$

Total Judgment: \$201,265.31

Filing Fee: \$

Comments: Together with pre-judgment interest at the rate of \$46.39 per day after November 14, 2017 until the entry of judgment, post-judgment interest, and costs.

You have 30 days after service of this notice upon you to file a written motion to open, modify or vacate the judgment.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of this Court.

Sandra K. Dalton
Clerk of the Circuit Court



**CIRCUIT COURT FOR FREDERICK COUNTY,
MARYLAND**

100 West Patrick Street
Frederick, Maryland 21701

Clerk of the Court: 301-600-1976
Assignment Office: 301-600-2015

To: JAMES C. JUSTICE, II
1716 KANAWHA BOULEVARD E
CHARLESTON WV 25305

Case Number: C-10-CV-17-000131

MIDDLETOWN VALLEY BANK VS. JUSTICE FARMS OF NORTH CAROLINA, LLC, ET AL.

Date: 12/07/2017

NOTICE OF CONFESSED JUDGMENT

I HEREBY CERTIFY that the following Judgment has been recorded in this Court in the above entitled case.

Judgment Against: James C. Justice, II

Judgment in Favor of: Middletown Valley Bank

Judgment Ordered On: 12/07/2017

Other Fee: \$

Judgment Entry Date: 12/07/2017

Service Fee: \$

Amount of Judgment: \$494,063.06

Attorney Fee: \$

Pre Judgment Interest:

Appearance Fee: \$

Total Judgment: \$494,063.06

Filing Fee: \$

Comments: Together with pre-judgment interest at the rate of \$112.66 per day after November 14, 2017 until the entry of judgment, post-judgment interest, and costs.

You have 30 days after service of this notice upon you to file a written motion to open, modify or vacate the judgment.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of this Court.

Sandra K. Dalton
Clerk of the Circuit Court



**CIRCUIT COURT FOR FREDERICK COUNTY,
MARYLAND**
100 West Patrick Street
Frederick, Maryland 21701

Clerk of the Court: 301-600-1976
Assignment Office: 301-600-2015

To: JAMES C. JUSTICE, II
1716 KANAWHA BOULEVARD E
CHARLESTON WV 25305

Case Number: C-10-CV-17-000131

MIDDLETOWN VALLEY BANK VS. JUSTICE FARMS OF NORTH CAROLINA, LLC, ET AL.

Date: 12/07/2017

NOTICE OF CONFESSED JUDGMENT

I HEREBY CERTIFY that the following Judgment has been recorded in this Court in the above entitled case.

Judgment Against: James C. Justice, II

Judgment in Favor of: Middletown Valley Bank

Judgment Ordered On: 12/07/2017

Other Fee: \$

Judgment Entry Date: 12/07/2017

Service Fee: \$

Amount of Judgment: \$656,569.59

Attorney Fee: \$

Pre Judgment Interest:

Appearance Fee: \$

Total Judgment: \$656,569.59

Filing Fee: \$

Comments: Together with pre-judgment interest at the rate of \$149.02 per day after November 14, 2017 until the entry of judgment, post-judgment interest, and costs.

You have 30 days after service of this notice upon you to file a written motion to open, modify or vacate the judgment.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of this Court.

Sandra K. Dalton
Clerk of the Circuit Court